

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF  
LAWRENCE ORGAN IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

1 I, LAWRENCE A. ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an  
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for  
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration  
5 in support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary  
6 Judgment. I have personal knowledge of the facts stated herein and if called upon to testify, I  
7 could and would competently testify thereto, except as to those matters that are stated upon  
8 information and belief.  
9

10 2. Attached hereto and marked as Exhibit A are true and correct copies of  
11 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000004.  
12 Defendant marked this document as "confidential" pursuant to the Protective Order and the  
13 document should therefore be sealed pursuant to this Order.  
14

15 3. Attached hereto and marked as Exhibit B is a true and correct cope of various  
16 excerpts from the deposition of Plaintiff Owen Diaz. Defendant marked this document as  
17 "confidential" pursuant to the Protective Order and the document should therefore be sealed  
18 pursuant to this Order.  
19

20 4. Attached hereto and marked as Exhibit C are true and correct copies of documents  
21 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000175 to  
22 NS000178. Defendant marked this document as "confidential" pursuant to the Protective Order  
23 and the document should therefore be sealed pursuant to this Order.  
24

25 5. Attached hereto and marked as Exhibit D are true and correct copies of  
26 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0001014  
27 to TESLA-0001050. Defendant marked this document as "confidential" pursuant to the  
28 Protective Order and the document should therefore be sealed pursuant to this Order.

1           6.       Attached hereto and marked as Exhibit E are true and correct copies of documents  
2 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000667 to TELSA-  
3 0000671. Defendant marked this document as “confidential” pursuant to the Protective Order  
4 and the document should therefore be sealed pursuant to this Order.

5           7.       Attached hereto and marked as Exhibit F is a true and correct copy of a document  
6 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000333. Defendant  
7 marked this document as “confidential” pursuant to the Protective Order and the document  
8 should therefore be sealed pursuant to this Order.

9           8.       Attached hereto and marked as Exhibit G are true and correct copies of  
10 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000108  
11 to NS000111. Defendant marked this document as “confidential” pursuant to the Protective  
12 Order and the document should therefore be sealed pursuant to this Order.

13           9.       Attached hereto and marked as Exhibit H are true and correct copies of  
14 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000095  
15 to NS000100. Defendant marked this document as “confidential” pursuant to the Protective  
16 Order and the document should therefore be sealed pursuant to this Order.

17           10.      Attached hereto and marked as Exhibit I is a true and correct copy of a document  
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000510. Defendant  
19 marked this document as “confidential” pursuant to the Protective Order and the document  
20 should therefore be sealed pursuant to this Order.

21           11.      Attached hereto and marked as Exhibit J is a true and correct copy of a document  
22 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000511. Defendant  
23 marked this document as “confidential” pursuant to the Protective Order and the document  
24 should therefore be sealed pursuant to this Order.

1           12. Attached hereto and marked as Exhibit K are true and correct copies of  
2 documents produced by Defendant Telsa, Inc. in discovery and Bates stamped TESLA-0000314  
3 to TESLA-0000316. Defendant marked this document as “confidential” pursuant to the  
4 Protective Order and the document should therefore be sealed pursuant to this Order.

5           13. Attached hereto and marked as Exhibit L is a true and correct cope of various  
6 excerpts from the deposition of Plaintiff Demetric Di-Az. Defendant marked this document as  
7 “confidential” pursuant to the Protective Order and the document should therefore be sealed  
8 pursuant to this Order.

9           14. Attached hereto and marked as Exhibit M is a true and correct cope of various  
10 excerpts from the deposition of Plaintiff Lamar Patterson. Defendant marked this document as  
11 “confidential” pursuant to the Protective Order and the document should therefore be sealed  
12 pursuant to this Order.

13           15. Attached hereto and marked as Exhibit N are true and correct copies of  
14 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0001003  
15 to TESLA-0001005 Defendant marked this document as “confidential” pursuant to the  
16 Protective Order and the document should therefore be sealed pursuant to this Order.

17           16. Attached hereto and marked as Exhibit O is a true and correct copy of a document  
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000060. Defendant  
19 marked this document as “confidential” pursuant to the Protective Order and the document  
20 should therefore be sealed pursuant to this Order.

21           17. Attached hereto and marked as Exhibit P is a true and correct copy of a document  
22 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000626. Defendant  
23 marked this document as “confidential” pursuant to the Protective Order and the document  
24 should therefore be sealed pursuant to this Order.

1           18.     Attached hereto and marked as Exhibit Q are true and correct copies of  
2 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000138  
3 to NS000139. Defendant marked this document as “confidential” pursuant to the Protective  
4 Order and the document should therefore be sealed pursuant to this Order.

5           19.     Attached hereto and marked as Exhibit R are true and correct copies of documents  
6 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped CITISTAFF-  
7 0000050 to CITISTAFF-0000055. Defendant marked this document as “confidential” pursuant  
8 to the Protective Order and the document should therefore be sealed pursuant to this Order.

9           20.     Attached hereto and marked as Exhibit S are true and correct copies of documents  
10 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000038 to  
11 NS000045. Defendant marked this document as “confidential” pursuant to the Protective Order  
12 and the document should therefore be sealed pursuant to this Order.

13           21.     Attached hereto and marked as Exhibit T are true and correct copies of documents  
14 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000095 to  
15 NS000100. Defendant marked this document as “confidential” pursuant to the Protective Order  
16 and the document should therefore be sealed pursuant to this Order.

17           22.     Attached hereto and marked as Exhibit U is a true and correct copy of a document  
18 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000014. Defendant  
19 marked this document as “confidential” pursuant to the Protective Order and the document  
20 should therefore be sealed pursuant to this Order.

21           23.     Attached hereto and marked as Exhibit V are true and correct copies of  
22 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped  
23 CITISTAFF-0000009 to CITISTAFF-0000010. Defendant marked this document as  
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28

1 “confidential” pursuant to the Protective Order and the document should therefore be sealed  
 2 pursuant to this Order.

3 24. Attached hereto and marked as Exhibit W are true and correct copies of  
 4 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000321  
 5 to TESLA-0000323. Defendant marked this document as “confidential” pursuant to the  
 6 Protective Order and the document should therefore be sealed pursuant to this Order.  
 7

8 25. Attached hereto and marked as Exhibit X is a true and correct copy of a document  
 9 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000317. Defendant  
 10 marked this document as “confidential” pursuant to the Protective Order and the document  
 11 should therefore be sealed pursuant to this Order.  
 12

13 26. Attached hereto and marked as Exhibit Y is a true and correct copy of a document  
 14 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000905. Defendant  
 15 marked this document as “confidential” pursuant to the Protective Order and the document  
 16 should therefore be sealed pursuant to this Order.  
 17  
 18  
 19

20 I declare under penalty of perjury under the laws of the United States of America that the  
 21 foregoing is true and correct. Executed on November 19, 2019 in San Anselmo, California.  
 22  
 23

24 DATED: November 19, 2019

By: /s/ Lawrence Organ  
 Lawrence A. Organ, Esq.  
 Navruz Avloni, Esq.  
 J. Bernard Alexander, Esq.  
 Attorneys for Plaintiffs  
 DEMETRIC DI-AZ AND OWEN DIAZ